

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE
AT KNOXVILLE

**SAMUEL M. MCGAW, JR., as the
Personal Representative of the Estate of
Samuel M. McGaw, IV, deceased,**

and

**LESLIE TOLX, mother and legal
Guardian of Samuel Marshall McGaw, V,
Zachary Aiden McGaw, Ava Belle McGaw,
Emma Grace McGaw, and
Addison Reese McGaw, the natural
children and next-of-kin of
Samuel M. McGaw, IV, deceased**

Plaintiffs,

v.

No. 3:15-CV-00012

**SEVIER COUNTY, TENNESSEE,
MICHAEL FOX; BRADLEY MOUNT;
HAYDEN WHALEY; JOSHUA MCKINZIE;
FIRST MED, INC.; JESSIE TIMBROOK,
LPN; and JUDY SIMS, LPN,**

Defendants.

DEFENDANT'S PRETRIAL DISCLOSURES

Comes now the Defendant, Sevier County, Tennessee, by and through counsel, pursuant to the Court's Scheduling Order) and Fed. R. Civ. P. 26 (a)(3) and hereby submits its Pretrial Disclosure information as indicated below:

A(i): Name and, if not previously provided, the address and telephone number of each witness (other than those for impeachment).

WILL CALL

1. Corrections Officer Bradley Mount
2. Corrections Officer Hayden Whaley
3. Corrections Officer Joshua McKinzie
4. Ronald Seals, Sevier County Sheriff
5. Chief Larry McMahan
6. Lieutenant Andy Loveday
7. Jeff Eiser

MAY CALL

1. Jessie Timbrook
Macon, Georgia
2. Corrections Officer Janette Alfonso
106 W. Bruce Street
Sevierville, TN 37862
3. Any and all witnesses listed by plaintiffs.

A(ii) Designation of those witnesses whose testimony is expected to be presented by deposition:

None.

A(iii) Identification of each document or other exhibit, including summaries of other evidence.

- a. The items Defendants expect to offer in whole or in part.
 1. Inmate intake sheet
 2. Inmate incident history
 3. Jail log 3/25/2014 – 3/26/104
 4. Inmate nurse progress notes 3/25-26/14
 5. Inmate medical form

6. Pass-on sheets D shift 3/26/2014
7. Relevant jail policies and procedures
8. Any and all documents disclosed or used by any other party or identified as discovery proceeds.

Respectfully submitted this the 11th day of June, 2018

/s/ Rhonda L. Bradshaw
Rhonda L. Bradshaw – 014082
Spicer Rudstrom, PLLC
800 S. Gay Street, Suite 1400
Knoxville, TN 37929
(865) 673-8516

CERTIFICATE OF SERVICE

I hereby certify that on 11th day of June, 2018, a copy of the foregoing Pretrial Disclosures was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. mail. Parties may access this filing through the Court's electronic filing system.

/s/ Rhonda L. Bradshaw
Rhonda L. Bradshaw